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THE CITY OF NEW YORK  
**LAW  
DEPARTMENT**  
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May 24, 2022

Judge Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Foley Square, Room 2230  
New York, NY 10007

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Re: *Byron v. The Bronx Parent Hous. Network et al.*,  
1:21-cv-02568-MKV

Dear Judge Vyskocil:

I write on behalf of defendant the City of New York (the “City”) to request (a) an adjournment of the initial pretrial conference (the “IPC”) and premotion conference (“PMC”)(collectively, the “Conferences”) on the City’s intended motion to dismiss the First Amended Complaint, both of which are currently scheduled for May 31, 2022, pending the outcome of the mediation to which you referred the parties on March 15, 2022 (ECF 46), and (b) a corresponding stay of discovery pending such outcome. All parties consent to this request.

On April 21 (ECF 58), the Court granted the parties’ first letter motion for an adjournment of the Conferences, which were then scheduled to take place on April 26, and for a stay of discovery. At that time, mediation in all five of the pending actions<sup>1</sup> naming the City, Bronx Parent Housing Network, Inc., Victor Rivera, and, in one action, certain other individuals, as defendants arising out of similar allegations, including sexual harassment, were scheduled to take place on May 9.

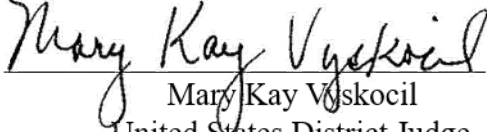
A joint mediation session in all five actions took place on May 9, and a subsequent mediation is necessary. A second session has been scheduled to take place on Friday, June 17. Accordingly, to provide the parties with the opportunity to continue the mediation process, the City respectfully requests that the date of the Conferences be adjourned and the stay of discovery be extended to a date after June 17 that is convenient for the Court.

<sup>1</sup> The other four actions are: *Britton v. BPHN, et al.*, 1:21-cv-07079-JPO; *Chavannes v. BPHN, et al.*, 1:21-cv-05060-JGK; *Flynn v. BPHN, et al.*, 1:21cv2871-NRB; *Taylor v. BPHN, et al.*, 1:21cv4890-PGG. As was the case as of the date of the City’s prior letter motion, none of those other actions is currently proceeding.

Respectfully Submitted,  
s/Noah Potter  
Special Assistant Corporation Counsel

**GRANTED. The initial pre-trial conference scheduled for May 31, 2022 at 10:30 AM is ADJOURNED to July 5, 2022 at 11:30 AM. The conference will be held in-person in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York. Absent exceptional circumstances, the Court will not further adjourn this conference. SO ORDERED.**

Date: 5/25/2022  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge